

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE DIMANCHE,

Plaintiff,

v.

MASSACHUSETTS BAY TRANSPORTATION
AUTHORITY, WILLIAM MCCLELLAN,
STEPHANIE BRADE, SHERYL REGISTER,
MAXINE BELL, FRED OLSON AND CHERYL
ANDERSON

Defendant.

* C.A. No.: 1:15-CV-10037-WGY

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PRESENT VALUE CALCULATIONS

The following sets forth the present value as to lost future income, mitigation based on Ms. Dimanche's current employment, and retirement income. Also set forth is lost back pay.

1. Lost Future Income

| | PV | |
|-------------------|-----------|-------------|
| | Reversion | |
| | (3%) | PV |
| 2016: \$12,403.73 | x .99 | \$12,279.70 |
| 2017: \$76,284.00 | x .971 | \$74,071.76 |
| 2018: \$78,002.75 | x .943 | \$73,556.59 |
| 2019: \$79,562.80 | x .915 | \$72,799.96 |
| 2020: \$81,154.01 | x .888 | \$72,064.76 |
| 2021: \$82,777.05 | x .862 | \$71,353.81 |
| 2022: \$84,432.59 | x .837 | \$70,670.07 |

2023: \$86,121.29 x .813 \$70,016.60

Total \$516,813.25

Mitigation (as to Future Pay)

From January 1, 2016 to January 1, 2024

$$\begin{array}{l} \text{PV (3\%)} \\ \text{Ord. Annuity} \\ \$25,000 \times 6.230 = \$155,750 \end{array}$$

Total Loss Future Income \$361,063.25

2. Lost Past Earnings

2013: \$54,968.60 (\$66,341.60 - \$11,373)

2014: \$69,981.60

2015: \$72,612.80

2016: \$59,130.12 (290/365 x \$74,422.40)

Total \$256,693.12

Mitigation 2013 - \$31,652 (unemployment)

2014 - \$5,108.66 (wages)

2015 - \$1,015.23 (wages)

Total \$ 37,775.89

Total Lost Back Pay **\$218,917.23**

3. Lost Retirement \$47,781.21/year

PV (3%)
Ord. Annuity

$$\$47,781.21 \times 21.832 = 1,043,159.37 \text{ (36 years)}$$

$$\$77,781.21 \times 6.230 = 297,676.94 \text{ (7 years)}$$

Total Lost Retirement (difference as to above amounts) \$745,482.43

MICHELLE DIMANCHE,

By her attorney,

LAW OFFICE OF
CHRISTOPHER J. TROMBETTA

/s/ Christopher J. Trombetta

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Dated: October 17, 2016

CERTIFICATE OF SERVICE

I, Christopher J. Trombetta, do hereby certify that on October 18, 2016 a copy of the foregoing document has been served via electronic mail on opposing counsel in this action.

/s/ Christopher J. Trombetta

Christopher J. Trombetta